

Remarks

[0001] Herein, the "Action" or "Office Action" refers to the non-final Office Action dated April 24, 2007.

[0002] Applicant respectfully requests reconsideration and allowance of all of the claims of the application. Claims 1-8 and 10-30 are presently pending. Claims amended herein are 1, 5, 11, 12, 17, 18, 22, and 26-30. Claim 9 is cancelled herein. New claims added herein are none.

Substantive Claim Rejections

35 U.S.C. §112 Second Paragraph Claim Rejections

[0003] Claims 1-21 and 26-30 are rejected under 35 U.S.C. 112 second paragraph as being indefinite (*Office Action*, p.2). More specifically, the Office indicated claims 1 and 26 recite "receiving..., loading..., identifying..., caching..., and processing..." but that it is unclear about the source and destinations of the recited limitations (*Office Action*, p.2). Similarly, the Office indicated claims 11 and 17 recite "receiving..., identifying..., determining..., and retrieving..." but that it is unclear about the source and destinations of the recited limitations (*Office Action*, p.2). Applicant notes that claim 9 has been canceled herein, accordingly the 112 second paragraph rejection of claim 9 is moot. Appropriate correction has been made herein to independent claims 1, 11, 17, and 26 to make sources and destinations clear and to thereby satisfy the definiteness requirement of 35 U.S.C. 112 second paragraph.

[0004] Accordingly, Applicant respectfully requests that the 35 U.S.C. 112 second paragraph rejections of independent claims 1, 11, 17, and 26 and of claims which depend therefrom be withdrawn.

35 USC § 103 Claim Rejections

[0005] Claims 1-30 are rejected under 35 U.S.C. §103(a) for obviousness over U.S. Patent No. 6,515,598 to Parenteau et al. (hereinafter, "Parenteau") in view of U.S. Patent No. 6,490,547 to Atkin et al. (hereinafter, "Atkin") (*Office Action*, p.3). Applicant notes that claim 9 has been canceled herein, accordingly the §103(a) rejection of claim 9 is moot.

[0006] Applicant respectfully traverses each of the remaining §103 rejections, and requests reconsideration and allowance in light of the comments and amendments contained herein. Accordingly, Applicant requests that the rejections be withdrawn and that the case be passed along to issuance.

[0007] **Claim 1** recites a method comprising:

receiving at a Web server, a file index associated with a plurality of localized strings of data;
loading the file index into a memory device associated with the Web server;
identifying pointers to frequently used localized strings of the plurality of localized strings;
caching the identified pointers at the Web server, so that in response to a user request for Web content, a localized string responsive to the user request can be identified in a single call when identified by a cached pointer;
processing user requests for Web content which are received by the Web server; and
indicating results of the processing for display in response to the user requests.

[0008] In making out the rejection, the Office essentially argues that Parenteau discloses all of the elements of claim 1, except that Parenteau does not teach “processing requests for Web content” and also does not teach that “each of the plurality of localized strings has an associated language and an associated locale” (*Office Action*, p.3; *Parenteau*, col.4 ln.11 to col.5 ln.21, col.5 Ins.36-64, col.11 Ins.1-24 and 32-34, and Figs.3-5).

[0009] The Office argues that Atkin cures the deficiencies of Parenteau since Atkin describes “processing requests for Web content; and that each of a plurality of localized strings has an associated language and an associated locale” (*Office Action*, p.3; *Atkin*, col.4 ln.28 to col.4 ln.42, and Fig.2).

[0010] The Office then argues that it would have been obvious to modify the system of Parenteau by incorporating the teaching of Atkin, because it would have provided support for a wide array of languages dynamically selected at run time (*Office Action*, p.4).

[0011] First, Applicant submits that Parenteau and/or Atkin do not teach or suggest the combination of features recited in amended claim 1. For example, the Parenteau-Atkin combination does not teach or suggest, “identifying pointers to frequently used localized strings of the plurality of localized strings”, as recited in claim 1 (Emphasis Added).

[0012] Instead, Parenteau describes a system and a method for compressing and decompressing data itself, in order to reduce bandwidth (*i.e.*, time) required to send the message over a network (*Parenteau*, col.3 Ins.26-33). The described system takes a character string from an input string, generates a hash value of the character string, and then uses the hash value in a look up table to address a list of previously matching character strings (*Parenteau*, Abstract).

[0013] Parenteau describes that a hash generator calculates indexes for the lookup table which is an array of pointers to a tracking table (*Parenteau*, col.4 Ins.11-15). The tracking table is described as a structure which permits a sequential search to find the longest matching string within those strings already encountered that begins with the same pair of characters (*Parenteau*, col.3 Ins.22-26). A valid pointer in the lookup table points to a slot in the tracking table which contains a simply linked list of

occurrences of the same pair of characters (*Parenteau*, col.3 Ins.16-18). The pointer in the lookup table is updated so that it is always pointing to the most recent occurrence of the pair of characters (*Parenteau*, col.4 Ins.29-33).

[0014] As such, *Parenteau* does not teach or suggest “teach or suggest, “identifying pointers to frequently used localized strings of the plurality of localized strings”, as recited in claim 1 (Emphasis Added). Applicant’s specification describes that “frequently used” or “common” localized strings are for example, those localized strings (of the plurality of localized strings) which have been identified as frequently used based on an analysis of past usage statistics, expected future usage, etc. (*Specification*, p.11 Ins.1-4). However, instead, of being concerned with “identifying pointers to frequently used localized strings, *Parenteau* describes that a lookup table is updated so that the pointer is always pointing to the most recent occurrence of the pair of characters (*Parenteau*, col.4 Ins.29-33). The pointer of *Parenteau* simply points at the most recent occurrence of the pair of characters without regard to how frequently the pair of characters appears.

[0015] *Atkin* fails to cure the deficiencies of *Parenteau*, as *Atkin* does not teach or suggest “teach or suggest, “identifying pointers to frequently used localized strings of the plurality of localized strings”, as recited in claim 1 (Emphasis Added). Instead, *Atkin* describes a system where a user interface for dialog boxes, and menus is “localized” with respect to human languages at run time (*Atkin*, Abstract). *Atkin* describes that a

user application includes a number of functional modules with user interfaces which include text strings in dialog boxes and pull down menus (*Atkin*, col.3 Ins.36-38). The application also includes a language manager module for selecting a human language in which text strings are to be displayed (*Atkin*, col.3 Ins.36-38). The user employs the language manager module to select a human language in which text strings for the user application are to be displayed within the user interfaces for the functional modules (*Atkin*, col.3 Ins.41-44).

[0016] Further, the Parenteau-Atkin combination does not teach or suggest, "caching the identified pointers at the Web server, so that in response to a user request for Web content, a localized string responsive to the user request can be identified in a single call when identified by a cached pointer", as recited in claim 1.

[0017] Instead, of being concerned with caching pointers to frequently used localized strings at the Web server, so that in response to a user request for Web content, a localized string responsive to the user request can be identified in a single call when identified by a cached pointer, Parenteau describes a lookup table which is updated so that the pointer is always pointing to the most recent occurrence of the pair of characters (*Parenteau*, col.4 Ins.29-33). The tracking table of Parenteau is described as a structure which permits a sequential search to find the longest matching string within those strings that begins with the same pair of characters (*Parenteau*, col.3 Ins.22-26).

[0018] As such, Parenteau does not teach or suggest “caching the identified pointers at the Web server, so that in response to a user request for Web content, a localized string responsive to the user request can be identified in a single call when identified by a cached pointer”, as recited in claim 1.

[0019] Atkin fails to cure the deficiencies of Parenteau, as Atkin does not teach or suggest “caching the identified pointers at the Web server, so that in response to a user request for Web content, a localized string responsive to the user request can be identified in a single call when identified by a cached pointer”, as recited in claim 1.

[0020] Further, even if the cited references disclosed all of this claim’s recited features, which they do not, the Office has nonetheless failed to provide a sufficient motivation to combine Atkin with Parenteau. Applicant contends that a person of ordinary skill in that art would not have attempted the combination put forth by the Office, and that the rejection at least in part constitutes nothing more than hindsight, utilizing Applicant’s application as a road map for the rejection which the Office makes. However, the impermissible use of hindsight is contrary to established law. For example:

The invention must be viewed not after the blueprint has been drawn by the inventor, but as it would have been perceived in the state of the art that existed at the time the invention was made. (*Sensonics Inc. v. Aerersonic Corp.*, Court of Appeals for the Federal Circuit 81 F.3d 1566; 38 USPQ2d (BNA) 1551).

[0021] Further, even if Parenteau were modified by Atkin as suggested by the Office, the compressing and decompressing of data described in Parenteau would simply include data representing different languages which have been selected by the user via the language manager module of Atkin. Accordingly, for this additional reason the Office has failed to make out a *prima facie* case of obviousness.

[0022] Accordingly, claim 1 is allowable over the Parenteau-Atkin combination for at least these reasons, and Applicant respectfully requests that the §103 rejection be withdrawn.

[0023] Claims 2-8 and 10 are allowable over the Parenteau-Atkin combination by virtue of their dependency upon claim 1 (either directly or indirectly). Additionally, some or all of claims 2-8 and 10 may also be allowable over the Parenteau-Atkin combination for independent reasons.

[0024] **Claim 11** recites a method comprising:

receiving at a Web server, a request from a client for content in a particular language, wherein the Web server includes a file index associated with a plurality of localized strings, and further includes a cache of identifying pointers to frequently used localized strings of the plurality of localized strings, so that a string resource responsive to the request can be identified in a single call when identified by a cached pointer;

identifying from the request, at least one string associated with the requested content, wherein the at least one string is associated with the particular language;

determining whether a pointer to the at least one string is stored in the cache;

if the pointer is stored in the cache:

retrieving the pointer from the cache; and

retrieving the at least one string using the pointer;

if the pointer is not stored in the cache, retrieving the at least one string from a storage device; and

indicating content referenced by the at least one string for display in response to the request.

[0025] In rejecting claim 11, the Office argues that the combination of Atkin and Parenteau renders its subject matter obvious. In making out the rejection of this claim, the Office essentially argues that Atkin discloses all of the elements of claim 11, except that Atkin does not teach or suggest "determining whether a pointer to the at least one string is stored in the cache if the pointer is stored in the cache: if the pointer is stored in the cache: retrieving the pointer from the cache; and retrieving the at least one string using the pointer" (*Office Action*, p.6). The Office argues that Parenteau cures the deficiencies of Atkin and that "it would have been

obvious to one of ordinary skill in the art at the time of the invention to modify the system of Atkin by incorporating the teaching of Parenteau (*Office Action*, p.6). Applicant disagrees for number of reasons presented herein.

[0026] First, Applicant submits that Parenteau and/or Atkin do not teach or suggest the combination of features recited in amended claim 11. For example, the Parenteau-Atkin combination does not teach or suggest, “receiving at a Web server, a request from a client for content in a particular language, wherein the Web server includes a file index associated with a plurality of localized strings, and further includes a cache of identifying pointers to frequently used localized strings of the plurality of localized strings, so that a string resource responsive to the request can be identified in a single call when identified by a cached pointer”, as recited in claim 11 (Emphasis Added).

[0027] Parenteau describes that a pointer in the lookup table points to a slot in the tracking table which contains a simply linked list of occurrences of the same pair of characters (*Parenteau*, col.3 Ins.16-18). The pointer in the lookup table is updated so that it is always pointing to the most recent occurrence of the pair of characters (*Parenteau*, col.4 Ins.29-33).

[0028] As such, Parenteau does not teach or suggest “teach or suggest, “wherein the Web server includes ... a cache of identifying pointers to frequently used localized strings of the plurality of localized

strings", as recited in claim 11 (Emphasis Added). Applicant's specification describes that "frequently used" or "common" localized strings are for example, those localized strings (of the plurality of localized strings) which have been identified as frequently used based on an analysis of past usage statistics, expected future usage etc (*Specification*, p.11 Ins.1-4). However, instead, of being concerned with identifying pointers to frequently used localized strings, Parenteau describes that a lookup table is updated so that the pointer is always pointing to the most recent occurrence of the pair of characters (*Parenteau*, col.4 Ins.29-33). The pointer of Parenteau simply points at the most recent occurrence of the pair of characters without regard to how frequently the pair of characters appears.

[0029] Atkin fails to cure the deficiencies of Parenteau, as Atkin does not teach or suggest "teach or suggest, "wherein the Web server includes ... a cache of identifying pointers to frequently used localized strings of the plurality of localized strings", as recited in claim 11 (Emphasis Added). Instead, Atkin describes a system where a user interface for dialog boxes, and menus is "localized" with respect to human languages at run time (*Atkin*, Abstract). Atkin describes that a user application includes a number of functional modules with user interfaces which include text strings in dialog boxes and pull down menus (*Atkin*, col.3 Ins.36-38). The application also includes a language manager module for selecting a human language in which text strings are to be displayed (*Atkin*, col.3 Ins.36-38). The user employs the language manager module to select a

human language in which text strings for the user application are to be displayed within the user interfaces for the functional modules (*Atkin*, col.3 Ins.41-44).

[0030] Further, the Parenteau-Atkin combination does not teach or suggest, that the Web server includes "a cache of identifying pointers to frequently used localized strings of the plurality of localized strings, so that a string resource responsive to the request can be identified in a single call when identified by a cached pointer", as recited in claim 11 (Emphasis Added).

[0031] Instead, of being concerned with caching pointers to frequently used localized strings at the Web server, so that in response to a user request for Web content, a localized string responsive to the user request can be identified in a single call when identified by a cached pointer, Parenteau describes a lookup table which is updated so that the pointer is always pointing to the most recent occurrence of the pair of characters (*Parenteau*, col.4 Ins.29-33). The tracking table of Parenteau is described as a structure which permits a sequential search to find the longest matching string within those strings that begins with the same pair of characters (*Parenteau*, col.3 Ins.22-26).

[0032] As such, Parenteau does not teach or suggest that the Web server includes "a cache of identifying pointers to frequently used localized strings of the plurality of localized strings, so that a string resource

responsive to the request can be identified in a single call when identified by a cached pointer", as recited in claim 11 (Emphasis Added).

[0033] Atkin fails to cure the deficiencies of Parenteau, as Atkin does not teach or suggest that the Web server includes "a cache of identifying pointers to frequently used localized strings of the plurality of localized strings, so that a string resource responsive to the request can be identified in a single call when identified by a cached pointer", as recited in claim 11 (Emphasis Added).

[0034] Further, even if the cited references disclosed all of this claim's recited features, which they do not, the Office has nonetheless failed to provide a sufficient motivation to combine Atkin with Parenteau. Applicant contends that a person of ordinary skill in that art would not have attempted the combination put forth by the Office, and that the rejection at least in part constitutes nothing more than hindsight, utilizing Applicant's application as a road map for the rejection which the Office makes.

[0035] Further, even if Parenteau were modified by Atkin as suggested by the Office, the compressing and decompressing of data described in Parenteau would simply include data representing different languages which have been selected by the user via the language manager module of Atkin. Accordingly, for this additional reason the Office has failed to make out a *prima facie* case of obviousness.

[0036] Accordingly, claim 11 is allowable over the Parenteau-Atkin combination for at least these reasons, and Applicant respectfully requests that the §103 rejection be withdrawn.

[0037] Claims 12-16 are allowable over the Parenteau-Atkin combination by virtue of their dependency upon claim 11 (either directly or indirectly). Additionally, some or all of claims 12-16 may also be allowable over the Parenteau-Atkin combination for independent reasons.

[0038] Claim 17 recites a method comprising:

receiving at a Web server, a request from a client for content in a particular language, wherein the server includes a file index associated with a plurality of localized strings, and further includes a cache of identifying pointers to frequently used localized strings of the plurality of localized strings, so that a string resource responsive to the request can be identified in a single call when identified by a cached pointer;

identifying at least one string associated with the requested content, wherein the at least one string is associated with the particular language;

determining the at least one string is stored in the cache;

retrieving the at least one string from the cache; and

indicating results of the retrieving for display in response to the request.

[0039] In making out the rejection of this claim, the Office argues that the combination of Parenteau and Atkin renders its subject matter obvious. The Office has used much the same argument as was used in making out a rejection of claim 11 (*Office Action*, p.7). In response,

Applicant asserts that amended claim 17 allowable over the Parenteau-Atkin combination based on reasoning similar to that discussed above in response to the rejection of claim 11. For the sake of brevity, Applicant has not repeated the arguments.

[0040] Accordingly, claim 17 is allowable over the Parenteau-Atkin combination for at least these reasons, and Applicant respectfully requests that the §103 rejection be withdrawn.

[0041] Claims 18-21 are allowable over the Parenteau-Atkin combination by virtue of their dependency upon claim 17 (either directly or indirectly). Additionally, some or all of claims 18-21 may also be allowable over the Parenteau-Atkin combination for independent reasons.

[0042] Claim 22 recites an apparatus comprising:

an interface to receive requests for Web content and to send responses to the received requests;

a cache to temporarily store pointers to frequently used localized strings of data, so that a string resource responsive to the user request can be identified in a single call when identified by a cached pointer; and

a processor coupled to the interface and the cache, wherein the processor is configured to receive requests for Web content from the interface and receive pointers from the cache, wherein the processor is further configured to retrieve a particular localized string using a pointer if the cache contains a pointer to the particular localized string, and wherein the processor retrieves the particular localized string from a storage device the cache does not contain a pointer to the particular localized string.

[0043] In making out the rejection of this claim, the Office argues that the combination of Parenteau and Atkin renders its subject matter obvious. The Office has used much the same argument as was used in making out a rejection of claim 1. In response, Applicant asserts that amended claim 22 is allowable over the Parenteau-Atkin combination based on reasoning similar to that discussed above in response to the rejection of claim 1. For the sake of brevity, Applicant has not repeated the arguments.

[0044] Accordingly, claim 22 is allowable over the Parenteau-Atkin combination for at least these reasons, and Applicant respectfully requests that the §103 rejection be withdrawn.

[0045] Claims 23-25 are allowable over the Parenteau-Atkin combination by virtue of their dependency upon claim 22 (either directly or indirectly). Additionally, some or all of claims 23-25 may also be allowable over the Parenteau-Atkin combination for independent reasons.

[0046] **Claim 26** recites one or more computer-readable storage media having stored thereon a computer program that, when executed by one or more processors, causes the one or more processors to:

- receive at a Web server, a file index associated with a plurality of localized strings, wherein each of the plurality of localized strings has an associated language;
- load the file index into a memory device associated with the Web server;
- identify pointers to commonly used localized strings of the plurality of localized strings;
- cache the identified pointers at the Web server, so that in response to a user request, a string resource responsive to the user request can be identified in a single call if identified by a cached pointer; and
- process user requests for localized data
- indicate results of the processing for display in response to the user requests.

[0047] In making out the rejection of this claim, the Office argues that the combination of Parenteau and Atkin renders its subject matter obvious. The Office has used much the same argument as was used in making out a rejection of claim 1. In response, Applicant asserts that amended claim 26 allowable over the Parenteau-Atkin combination based on reasoning similar to that discussed above in response to the rejection of claim 1. For the sake of brevity, Applicant has not repeated the arguments.

[0048] Accordingly, claim 26 is allowable over the Parenteau-Atkin combination for at least these reasons, and Applicant respectfully requests that the §103 rejection be withdrawn.

[0049] Claims 27-30 are allowable over the Parenteau-Atkin combination by virtue of their dependency upon claim 26 (either directly or indirectly). Additionally, some or all of claims 27-30 may also be allowable over the Parenteau-Atkin combination for independent reasons.

Dependent Claims

[0050] In addition to its own merits, each dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each dependent claim where its base claim is allowable.

Conclusion

[0051] All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Office is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

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